

In the Matter Of:

NEW ENGLAND COMPOUNDING PHARMACY INC. PRODUCTS LIABILITY

VIDEOTAPED DEPOSITION OF RITU T. BHAMBHANI, M.D.

February 10, 2016



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1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MASSACHUSETTS
3

4 IN RE: NEW ENGLAND
5 COMPOUNDING PHARMACY, INC. MDL No. 2419
6 PRODUCTS LIABILITY LITIGATION Master Docket
7 1:13-md-02419-RWZ
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11 VIDEOTAPED DEPOSITION DUCES TECUM
12 OF RITU T. BHAMBHANI, M.D.
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15 Wednesday, February 10, 2016
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23 Reported by: Lori J. Goodin, RPR, CLR, CRR,
24 Realtime Systems Administrator
25 Assignment No. 26236



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1 Q. Right.

2 A. I don't, I am not sure if that is
3 who they got it from day one over there or not.
4 That is who they were getting it from when I left
5 and I asked who were they getting it from at the
6 time in 2008.

7 Q. Right. And so, my, all of that
8 background that you have described, related to
9 your decision to use preservative-free MPA, not
10 the source of that preservative-free MPA.

11 I mean earlier on in this
12 deposition, you are looking at me like I have two
13 heads here.

14 A. No, no.

15 Q. Early in the deposition I was asking
16 you about your decision to use preservative-free
17 MPA, and drew a distinction between that decision
18 and the source of it, do you recall that?

19 A. So, if the question is the decision
20 to use it?

21 Q. No, I'm sorry.

22 A. Or where to get it from?

23 Q. That's right. What I'm trying to
24 confirm is that your decision to purchase from
25 NECC was based upon your conversation with the

1 folks from Harford, right?

2 A. And having used NECC's
3 preservative-free MPA at Harford for years
4 without any problem.

5 Q. Right.

6 A. Yes.

7 Q. Okay. And, other than speaking with
8 the folks from Harford in 2008, did you have any
9 conversation with anybody else about NECC in 2008
10 when you made the decision to continue with them?

11 A. Not that I recall.

12 Q. Okay. One of the things you mention
13 in the Answers to Interrogatories is that NECC
14 was a, was licensed with the Maryland Department
15 of Pharmacy.

16 Did you verify that in 2008?

17 A. I don't remember specifically one
18 way or the other.

19 Again, it was being used at the
20 other center where I was.

21 They had been getting it for a
22 period of time. I had been using it there no
23 problems.

24 So, when I decided to get it, did I
25 specifically ask for that license? I don't